

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence  
of the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington  
December 9, 2020

WILLIAM M. McCOOL, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

NO. CR20-215 RSM

**INDICTMENT**

v.

ELLEN BRENNAN REICHE and  
SAMANTHA FRANCES BROOKS,  
Defendants.

The Grand Jury charges that:

**COUNT 1**  
**(Violence Against Railroad Carriers)**

On or about November 28, 2020, within Whatcom County, within the Western District of Washington, ELLEN BRENNAN REICHE and SAMANTHA FRANCES BROOKS did knowingly and without lawful authority and permission impair the operation of a railroad signal system, *i.e.*, by placing a “shunt” across the railroad tracks at Burlington Northern Santa Fe (“BNSF”) milepost 100.319, and attempted and conspired to do the same, conduct that was against and affecting a railroad carrier engaged in interstate and foreign commerce, *i.e.*, BNSF.

1 All in violation of Title 18, United States Code, Section 1992(a)(5), (a)(10),  
2 (c)(1), and Section 2.

3  
4 A TRUE BILL:

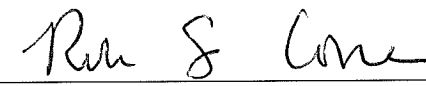
5 DATED: 12/9/2020

6  
7 *(Signature of Foreperson redacted pursuant to*  
8 *the policy of the Judicial Conference of the*  
9 *United States)*

10 FOREPERSON

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12  
13 BRIAN T. MORAN  
14 United States Attorney

15   
16 TODD GREENBERG  
17 Assistant United States Attorney

18   
19 THOMAS M. WOODS  
20 Assistant United States Attorney